

**Department of Energy**

ROCKY FLATS FIELD OFFICE
10808 HIGHWAY 93, UNIT A
GOLDEN, COLORADO 80403-8200

OCT 18 2002

02-DOE-01523

Mr. Steven H. Gunderson
Rocky Flats Cleanup Agreement Project Coordinator
Colorado Department of Public Health and Environment
4300 Cherry Creek Drive South
Denver, Colorado 80246-1530

To: Jan R.
6 pages
x 8345

Dear Mr. Gunderson:

Please find enclosed a completed Rocky Flats Cleanup Agreement Standard Operating Protocol (RSOP) for Component Removal Notification Form for Building 881 Resource Conservation and Recovery Act Unit 881.3B. Partial closure of Unit 881.3B was previously accomplished under the Closure Description Document for Treatment Unit 881.3B - UV Oxidation Process in Building 881. This notice will cover the rest of this unit, but it does not include In-Situ process permitted under 881.3B. This work will be conducted in accordance with the work control prepared by Environmental Chemical Corporation. This notice also clarifies the boundary for closure of Unit 887.2. Notification of this unit was originally provided on February 27, 2002, in Department of Energy memorandum 02-DOE-00306. The boundary is now described to include the removal of the underground piping from valve vault 1 (VV0001) up to the project boundary, and will make the description agree with project documents. Questions can be directed to Steve Tower at (303) 966-2133.

Sincerely,

Joseph A. Legare
Assistant Manager
for Environment and Stewardship

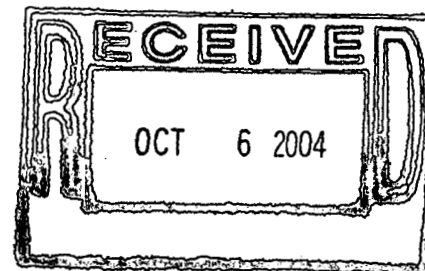
Enclosure

cc w/o Encl:

S. Tower, AMP, RFFO
K. Kehler, K-H RISS D&D
J. Monroe, K-H RISS D&D
S. Nesta, K-H RISS D&D
T. Rehder, USEPA

cc w/Encl:

Administrative Record



ADMIN RECORD

B881-A-000061

CORRES. CONTROL
OUTGOING LTR. NO.
DOE ORDER # 4700.1

02-RF-02056



DST.	LTR. ENC.
BRAILS FORD, M.D.	
FERRERA, D.W.	
FERRI, M.S.	
MARTINEZ, L.A.	
PARKER, A.	
POWERS, K.	
SCOTT, G.K.	
SHELTON, D.C.	
SPEARS, M.S.	
TRICE, K.D.	
TUOR, N.R.	

SEP 17 2002

02-RF-02056

AGUILAR, P.	
ALBIN, C.	X X
AUBLE, M.	
BEAN, C.	
BUTLER, J. L.	
CERCLA AR (T180G)	
CLARK, D.	
DIETERLE, S.	
DORR, K.	
FRANCIS, M.	
FREEDOTH, C.	
GEIS, A.	
GIBBS, F.	X X
GUTHRIE, V.	
HUMSTON, T.	
KEHLER, K.	
KONWINSKI, G.	
MARSHALL, J.R.	
MARTIN, D.	
MYERS, K.	
NESTA, S.	X X
NORTH, K.	
OLIVER, R.	
OMAN, K.	
PRIMROSE, A.	
ROSENMAN, A.	
SNYDER, D.P.	
SPENCE, T.	
WIEMELT, K.	

Steve Tower
D&D Program Lead
DOE, RFFO

RSOP FOR COMPONENT REMOVAL, SIZE REDUCTION, AND DECONTAMINATION
ACTIVITIES NOTIFICATION LETTER FOR RCRA UNIT 881.3B COMPONENT REMOVAL,
SIZE REDUCTION, AND DECONTAMINATION - FEG-020-02

Attached is a draft transmittal letter to the Colorado Department of Public Health and Environment involving the RSOP notification for Component Removal, Size Reduction and Decontamination for the closure of RCRA Unit 881.3B. The draft transmittal letter has been prepared from DOE building point of contact to CDPHE building point of contact; however, it could also be addressed from DOE RFCA coordinator to CDPHE RFCA coordinator.

This notification is also to clarify the boundary for closure of RCRA Unit 887.2. Notification for 887.2 was originally provided on Feb 27, 2002, DOE letter 02-DOE-00306. The boundary for removal of the process waste system will include removal of the underground piping from valve vault 1 (VV0001) up to the project boundary. This is to agree with the existing project documents.

Please contact Steve Nesta x6386 with questions or concerns.

CORRES. CONTROL X X
ADMIN RECDY150G
TRAFFIC
PAY\$130

Frank E. Gibbs

CLASSIFICATION:
UCN
UNCLASSIFIED X X
CONFIDENTIAL
SECRET

Frank E. Gibbs
Manager, Industrial Facility Disposition
Remediation, Industrial D&D, and Site Services

AUTHORIZED CLASSIFIER
SIGNATURE

Attachments:
As Stated

Date:
IN REPLY TO RFP CC NO.:

CCA:pvt

ACTION ITEM STATUS:
☐ PARTIAL/OPEN
☐ CLOSED
LTR APPROVALS:

Org. and 1 cc - Steve Tower

cc:
Joe Legare

ORIG. & TYPIST INITIALS:
SNM:pvt

Attachment 1
FEG-020-02
Page 1 of 2

David Kruchek
Colorado Department of Health and Environment
4300 Cherry Creek Drive South
Denver, CO 80222-1530

**RSOP FOR COMPONENT REMOVAL, SIZE REDUCTION, AND DECONTAMINATION
ACTIVITIES NOTIFICATION LETTER FOR RCRA UNIT 881.3B COMPONENT REMOVAL,
SIZE REDUCTION, AND DECONTAMINATION**

Mr. Kruchek:

In accordance with the Rocky Flats Cleanup Agreement Standard Operating Protocol (RSOP) for Component Removal, Size Reduction and Decontamination Activities, this letter and its attachments is notification for RSOP implementation. This notification is for RCRA unit closure of RCRA Unit 881.3B in Building 881. This will involve component removal, size reduction and decontamination activities utilizing the methods specified in the RSOP.

Partial closure of Unit 881.3B was previously accomplished under the Closure Description Document for Treatment Unit 881.3B - UV Oxidation Process in Building 881.

This notification will close all portions of Unit 881.3B located in Building 881. It does not include closure of the In-Situ process permitted under 881.3B.

The appropriate documentation required by the RSOP is enclosed with this letter and should provide the necessary information. This work will be conducted in accordance with the work control documentation prepared by the subcontractor.

This notification is also to clarify the boundary for closure of RCRA Unit 887.2. Notification for 887.2 was originally provided on Feb 27, 2002, DOE letter 02-DOE-00306. The boundary for removal of the process waste system will include removal of the underground piping from valve vault 1 (VV0001) up to the project boundary. This is to agree with the existing project documents.

If you have any questions regarding this, please contact me at (303) 966-2133.

Steve Tower
U.S. Department of Energy

Attachment 1
FEG-020-02
Page 2 of 2

Project scope: 881.3B RCRA Unit Closure			
Facility description: Building 881, Manufacturing and General Support Building			
Description of planned activity(ies): RCRA Unit Closure			
Facility/rooms/slots/areas involved: Building 881, Room 267			
Is RCRA unit closure(s) part of the planned activity?			<input checked="" type="checkbox"/> Yes
If RCRA units are included, attach unit specific information sheets and drawings			<input type="checkbox"/> No*
Attach checklists from Appendix A of the RSOP. <i>No checklists are provided; the checklists submitted with the Building 881/887 notification cover the component removal/size reduction/decontamination activities associated with RCRA closure</i>		Component Removal/Size Reduction	
		Decontamination	
RLCR Status	<input checked="" type="checkbox"/>	RLCR complete and concurrence received: 12/20/01	
	<input type="checkbox"/>	RLCR initiated but incomplete; concurrence anticipated:	
	<input type="checkbox"/>	RLC has not been initiated¹ and is scheduled for initiation on:	
If RLCR is not complete or initiated, what data will be used to plan the work activities?			
Activity requires modification to the ARARs listed in the RSOP.			<input type="checkbox"/> Yes, attach to letter
			<input checked="" type="checkbox"/> No
Attach Administrative Record file requirements for the activity.			
Point of contact for each facility/activity: Kurt Kehler, 303-966-3505			
Duration of work activities: 18 months		Anticipated work start: 10/01/02	
Attach schedule for each facility or activity for information purposes. Schedule submitted with the Building 881 notification, included the RCRA unit closure activities.			
Does the activity involve removing contaminated portions of the building shell? Include a description of the activity, contamination levels and controls			<input type="checkbox"/> Yes, LRA consultation and concurrence required
			<input checked="" type="checkbox"/> No
Are there deviations/exceptions to the RSOP for the proposed activity(ies)?			<input type="checkbox"/> Yes
			<input checked="" type="checkbox"/> No
Provide an explanation of deviation/exception to the RSOP: Not applicable			
C. Check the appropriate resulting action box below			
Additional RFCA decision document required (PAM - IM/IRA)			
Major modification to RSOP		Field change to RSOP	
Minor modification to RSOP		LRA consultation	
Activity(ies) will result in the following waste types			Process waste
			<input checked="" type="checkbox"/> Remediation waste
TRU	<input checked="" type="checkbox"/>	LLW	<input checked="" type="checkbox"/>
LLMW	<input checked="" type="checkbox"/>	Haz	<input checked="" type="checkbox"/>
Sanitary	<input checked="" type="checkbox"/>	Other:	
LRA Notification Review Time		14 days, no RCRA unit closure involved	
		<input checked="" type="checkbox"/> 30 days, RCRA unit closure involved	

¹ Evaluate using DPP, Sections 1.1.4 and 1.1.5 and the consultative process to implement activities

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1.0 INTRODUCTION

This technical scope summary provides RCRA unit specific closure information relative to the permitted reactive chemical treatment unit, RCRA unit 881.3B. The unit is located in building 881, room 267, hoods 3/4/5. This unit was used to treat reactive chemicals from RFETS prior to disposal as low level waste.

The closure of this RCRA regulated unit shall be in accordance with the Rocky Flats Environmental Technology Site's (RFETS) "RFCRA Standard Operating Protocol (RSOP) for Facility Component Removal, Size Reduction, and Decontamination Activities, Revision 0, 4 February, 2001".

2.0 SYSTEM DESCRIPTION AND WASTE CHARACTERIZATION

The permitted unit consists of 4 treatment processes that are accomplished in Building 881, room 267, hoods 3/4/5, and an In Situ treatment for peroxide forming compounds. The treatment processes authorized for building 881 are; UV Oxidation, Hydrolysis, Cementation, and Organic Treatment. This unit was authorized for the treatment of hazardous waste chemicals only.

The UV Oxidation process was previously closed under a Closure Description Document and all waste from the closure has been shipped.

At the conclusion of chemical treatment all loose materials were removed from the Permitted unit and packaged as low-level mixed waste. The portions remaining are the hoods. The hoods will be closed in accordance with the Facility Component Removal, Size Reduction, and Decontamination Activities RSOP, section 5.1.3 "Unit Removal without On-site Treatment".

Based on a review of the treatment records for 881.3B the following EPA codes apply; D004, D005, D006, D007, D008, D009, D010, D011, P011, P012, P015, P022, P028, P030, P087, P098, P099, P106, P113, P119, P120, U003, U098, U123, U144, U145, U151, U204, U214, U215, U216, U217.

Waste generated in association with these removal actions will be managed in accordance with Section 7.3, "Waste Management" of the RSOP.

2.1 System Boundaries

The boundary for this RCRA unit is hoods 3, 4, and 5 in Building 881 room 267. Only the portions of the hood surface that have evidence of contact with treated chemicals will be managed as hazardous waste.

This closure does not include the In Situ process permitted for 881.3B. This process will remain active and may be performed at other facilities on site.

Attachment 2
FEG-020-02
Page 2 of 2

3.0 Soil Contamination Evaluation and Post Closure Care

All of the treatment was conducted within the lab hoods. There was no contamination of the soil or the building structure.

4.0 RECORDKEEPING

RCRA unit closure activities will be documented in the Pre-Demolition Survey Report (PDSR) which will be completed prior to building demolition. Upon final closure of unit 881.3B the Site's Master List of RCRA units will be updated with the closure status and a permit modification will be submitted to remove the unit from the RCRA Permit.

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